

FILED

DEC 04 2024

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY BRC DEP CLK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:24-mj-2541-BM

UNITED STATES OF AMERICA

v.

ALEXANDER JUSTIN WHITE
a/k/a "Sulaiman Al-Amriki"

MOTION TO SEAL
CRIMINAL COMPLAINT
AND AFFIDAVIT

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby moves this Honorable Court for an Order sealing the Criminal Complaint and Affidavit regarding the above-referenced matter, and this Motion to Seal, and in support thereof, shows unto the Court as follows:

1. A special agent of the Federal Bureau of Investigation (FBI) has made an application for a criminal complaint on December 4, 2024, regarding the above-referenced subject.
2. The affidavit submitted in support of the criminal complaint contains substantial background information concerning an ongoing investigation being conducted by the FBI. Disclosure of the affidavit would alert potential targets of the existence, scope, and details of the investigation and, therefore, would pose a risk of flight or the destruction of additional evidence and may otherwise compromise the investigation. See Baltimore Sun Co. v. Goetz, 886 F.2d 60 (4th Cir. 1989).

WHEREFORE, the government moves for an Order sealing the Criminal Complaint and Affidavit, and this Motion to Seal, until further order by this Honorable Court, except that a filed copy of the same be provided to the Office of the United States Attorney for distribution to the FBI.

Respectfully submitted, this 4th day of December, 2024.

MICHAEL F. EASLEY, JR.
United States Attorney



GABRIEL J. DIAZ
Assistant United States Attorney
Criminal Division